

In re the search of: **Express Mail Parcel EI 527734304 US**

A F F I D A V I T

I, E.D. Bracken, after first being duly sworn, do swear and state:

I am a United States Postal Inspector, and have been so employed for the past twenty-six years. In that capacity, I have learned of the matters set forth herein.

Title 21, United States Code, Section 841(a)(1) makes it an offense for any person to manufacture, distribute, or possess with intent to manufacture or distribute, a controlled substance. Title 21, United States Code, Section 843(b) makes it an offense for any person knowingly or intentionally to use any communication facility in committing or in causing or facilitating the commission of any act or acts constituting a felony under any provisions of Subchapter I or Subchapter II of the Drug Abuse Prevention and Control Act. Title 21, United States Code, Section 846 makes it an offense for two or more people to conspire to commit any offense set out in Title 21. Title 18, United States Code, Section 1956 makes it an offense to send monetary instruments with the intention of promoting or carrying on of specified unlawful activity and/or concealing the nature, ownership, or control of the proceeds.

I know from training and experience that illegal drugs and proceeds are often distributed by U. S. Mail. What follows is not meant to set forth all exhaustive knowledge of this case, but only those facts necessary in order to establish probable cause.

On June 9, 2015, a postal employee at the Chattanooga, TN Processing and Distribution Plant received a call from a male with a Hispanic-sounding accent. The postal employee said the man declined to give his name but he stated drugs would be arriving on June 9, 2015 via Express Mail in Chattanooga, TN, which had been shipped from Phoenix, AZ. The postal employee said the man hung up and provided no more details.

On June 9, 2015, I was able to locate two Express Mail parcels that had been shipped from Phoenix, AZ to Chattanooga, TN.

1. **Express Mail Parcel EI 527734304 US:**

To:
Carla Pitts
1701 N. Concord, Apt 15
Chattanooga, TN 37421

From:
Jerry Rice
24003 N. 24th PL
Phoenix, AZ 85024

The package weighs approximately 14 pounds and 13 ounces. The shipping cost was \$107.30.

Delivery Address:

A search of postal service databases revealed that the delivery address (1701 N. Concord, Apt 15, Chattanooga, TN) has previously received two priority parcels but neither was sent from Phoenix, AZ. The name "Carla Pitts" was not listed in the CLEAR database as being associated with the listed delivery address, but two similar names – "Ciara Pitts" and "Chantel Pitts" – were listed as being associated with the address.

Shipper Address:

From October 2013 through May 7, 2015, the shipper's address (24003 N. 24th Pl, Phoenix, AZ) has received approximately thirty-four Priority Mail parcels from AZ, CA, CO, MN, MO, NJ, NY, OR, TX, UT, and WY. The name "Jerry Rice" is not listed in the CLEAR database as being associated with the listed shipper address.

2. **Express Mail Parcel EI 527731529 US:**

To:	From:
Sandra Jackson	Radley Lewis
2410 Hickory Valley St	5020 N. 35 th Ave
Chattanooga, TN 37421	Phoenix, AZ 85017

The package weighs approximately 17 pounds and 2 ounces. The shipping cost was \$119.10.

Delivery Address:

From July 2014 through June 2, 2015, 2410 Hickory Valley St, Chattanooga, TN received one priority and two Express Mail parcels (not including the parcel in my possession). The two previously shipped Express Mail parcels were mailed from Phoenix, AZ. The name "Sanda Jackson" is not associated with this address in the CLEAR database. A search of postal databases, however, shows that one of the previously shipped Express Mail parcels was signed for by a "Stephanie Jackson."

Shipper Address:

From November 2012 through September 2013, the address at 5020 N 35th Ave in Phoenix, AZ has received six Priority Mail parcels from CO, MN, and MO. A search of the CLEAR database revealed that no one by the name of "Raddly Lewis" is associated with the listed shipper address.

In my experience drug traffickers often use the U.S. Postal Service, especially Express and Priority Mail, to send money to pay for illegal narcotics. Drug traffickers often use fictitious names on parcels they ship or receive containing illegal narcotics to avoid detection by law enforcement.

The Hamilton County Sheriff's Office (HCSO) utilizes dogs that are well trained in the detection of hidden controlled substances. One such animal, "Maly," has been utilized in several investigations and has proven reliable. That is, when "Maly" has alerted on a package or vehicle suspected of containing drugs, the package/vehicle has been found to contain drugs and/or proceeds. "Maly" has been trained to detect by smell and to alert his handler to the presence of several controlled substances, including but not limited to cocaine, marijuana, heroin, and methamphetamine. "Maly" has been in service for approximately two months and received her initial certification on April 17, 2015, from "K9 Working Dogs International," in Longford, KA. On May 8, 2015, "Maly" was re-certified by HCSO deputies. HCSO K9 handlers state they give continuous training to their K9's in the detection of illegal narcotics in parcels.

On June 10, 2015, I was present when Express Mail Parcel **EI 527734304 US** was placed along with three other "dummy parcels" for review by "Maly" and her handler, HCSO Deputy William Johnson. Deputy Johnson informed me that "Maly" positively alerted to the above mentioned parcel, indicating the package contains one or more of the above named controlled substances, and/or cash proceeds that were in close proximity to such narcotics.

Based on the foregoing, I have reason to believe that a search of the parcel will reveal contraband, evidence, and/or proceeds regarding a violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846, and Title 18, United States Code, Section 1956.

In consideration of the foregoing, I respectfully request that this Court issue a search warrant permitting the search of the parcel described as follows: A brown parcel containing USPS Tracking Number Express Mail Parcel **EI 527734304 US** and addressed as follows:

To:
Carla Pitts
1701 N. Concord, Apt 15
Chattanooga, TN 37421

From:
Jerry Rice
24003 N. 24th PL
Phoenix, AZ 85024

Further, affiant sayeth not.



E.D. Bracken
U. S. Postal Inspector

Subscribed and sworn to before me this 11th day of June, 2015.



The Honorable William B. Mitchell Carter
U. S. Magistrate Judge